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Via Overnight FedEx Delivery

Ms. Kristine Koch
Remedial Project Manager
United States Environmental Protection Agency, Region 10
Office of Environmental Cleanup, Mail Code ECL-115
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

**Re: Cenveo Corporation's Response to U.S. EPA's 104(e) Request for the
Portland Harbor Superfund Site**

Dear Ms. Koch:

Enclosed please find Cenveo Corporation's ("Cenveo") Response to U.S. EPA's 104(e) Request ("Request") for the Portland Harbor Superfund Site. On May 15, 2008, Ms. Deb Yamamoto of your office granted Cenveo an extension to respond until July 1, 2008, and a second extension on June 24 until July 31, 2008. Cenveo appreciates the cooperation of the U.S. EPA (the "EPA") in granting Cenveo's requests for the extensions.

The following explanation as to how Cenveo's Response was drafted will allow the EPA to more easily understand and review the Response itself. The Graphic Arts Center, Inc. ("GAC"), which in August 1995 was purchased by and subsequently, through a series of transactions, merged into the company now known as Cenveo has had, over the years, a nexus to no fewer than eleven (11) properties in the Investigation Area. While most of these properties were warehouses and parking lots, Cenveo has attempted to learn as much about each of the facilities as it could, and has provided this information in the attached Response.

In order for there to be as little confusion about these multiple locations as possible, Cenveo's "primary response" is for its GAC facility at 2000 NW Wilson Street. Specific information relating to this facility can be found in Cenveo's primary response that contains all 82 Requests and Responses. In addition to this primary response, Cenveo has also included "mini" responses for each of the other ten facilities to Requests 4 through 78. Each "mini" response bears the name of the facility discussed in that response at the top of the first page. Thus, each of the other ten facilities has its own mini response that includes responses to

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Requests 4 through 78. These include, in this order, GAC/Flexoprep, South Parking Lot, North Parking Lot, Iron Mountain, Iron Mountain Annex, Swan Island, Front Avenue, NW 19th Avenue/Thurman, Creative Mailing and the Small Gravel Parking Lot west of the main GAC facility. However, Cenveo has used only one set of exhibit numbers for all of the responses, so an exhibit referred to in the Iron Mountain response as Exhibit 2, for example, would be the same document as Exhibit 2 in the Swan Island response. Cenveo hopes that this methodology is easily understood by EPA, and Cenveo will be glad to respond to any questions that EPA might have about this procedure.

Where EPA has used a series of subparts in which to pose requests related to a primary Request, if Cenveo has been able to respond in a short sentence to all of the subsections for which it has information, Cenveo has done so with the hope that EPA can more easily review and understand the information provided in the sentence format, rather than trying to piece together the information from responses in several subsections.

One of the issues that GAC faced over the years was not having enough space to store paper for its printing needs and space in which to store and stage completed print jobs that would then be forwarded to the post office system for processing. Thus, as EPA works through the responses, the EPA will see that GAC used a number of warehouse facilities not far from GAC's main facility at 2000 NW Wilson Street. The primary requirements of the warehouse facilities were that there was some type of loading dock associated with the facility, and that there was plenty of room for raw paper storage and staging areas for upcoming mailings. To the best of Cenveo's knowledge, none of these warehouse facilities performed any printing activities, and only the warehouses referred to as the Iron Mountain facility and the Annex, both just across NW 20th Avenue from the main GAC facility at 2000 NW Wilson Street, contained support operations for the main facility. The Iron Mountain facility had a small maintenance shop that helped service the printing machines at GAC, and for a time GAC's hazardous waste was stored in a 90-day storage area at the Annex.

As many other recipients of the 104(e) Request have done, Cenveo objects in general to the Request as being overly broad and overreaching, not being designed to limit the Request to develop only information that is relevant to the Portland Harbor Superfund Site, being outside of the authority granted to EPA to request information from potentially responsible parties ("PRPs") pursuant to Section 104(e) and requiring PRPs to spend excessive amounts of money to respond that far outweigh any benefit to EPA or the environment. However, without waiving these objections, and also subject to any other objections that Cenveo has cited in response to

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individual requests, Cenveo has put forth a good-faith attempt to provide the EPA with information responsive to each request.

Cenveo has not been able to identify a document retention policy that GAC utilized prior to the time Cenveo purchased GAC in 1995. It is not clear at this point in time how GAC dealt with document retention issues prior to the purchase. However, once Cenveo took control of GAC, Cenveo installed its own document retention policy, and nearly all of the non-essential documents older than seven (7) years prior to 1995 were discarded when Cenveo purchased GAC that year. The oldest version of the policy that Cenveo identified is a 2000 policy, which has been included with the Response as Exhibit 36. Cenveo is not aware of any documents that might have been discarded that would have been responsive to the 104(e) Request or that contained information relevant to the 104(e) Request, but if Cenveo learns of any information contained in one or more discarded documents that would have been responsive to the Request, Cenveo will forward the information to EPA in a timely manner.

Very truly yours,



Steve N. Siegel

SNS/cp

Enclosures

cc: Pete Popovics (w/CD only)
Marcia E. Berry, Esq. (w/CD only)
Missy Otis (w/CD only)

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Document Information

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Site Name: PORSE - Portland Harbor

104(e) Response Cenveo Corporation:

CD Transmitting Response and Supporting Exhibits to EPA's Request for Information - (07/31/2008).
(Contents of CD Have Been Processed and Uploaded Into SDMS)